

5. Based upon service of plaintiffs' amended expert report on October 23, 2024, the parties request that the Court enter an order extending expert discovery as if plaintiffs' expert report had been originally served on October 23, 2024, and accordingly request that the expert discovery schedule be extended as follows: (a) defendants shall depose plaintiffs' expert by December 9, 2024; (b) defendants' expert disclosure shall be served by February 7, 2025; (c) plaintiffs shall depose defendants' expert(s) by March 24, 2025; and (d) the dates for filing the parties' joint status report and the next status hearing be set as determined by the Court.

Wherefore, for the reasons set forth above, the parties jointly request that the Court enter an order (1) striking defendants' pending motion to compel (Dkt. 310) as moot, (2) extending expert discovery as follows: (a) defendants shall depose plaintiffs' expert by December 9, 2024; (b) defendants' expert disclosure shall be served by February 7, 2025; (c) plaintiffs shall depose defendants' expert(s) by March 24, 2025; and (d) setting the dates for filing the parties' joint status report and the next status hearing, as determined by the Court, and (3) striking the November 14, 2024 hearing date on defendants' pending motion to compel.

Dated: November 4, 2024

Respectfully submitted,

/s/ Barbara L. Greenspan
Attorney for Defendants
Barbara L. Greenspan
Thomas J. Verticchio
Vjolca Salu
Assistant Attorneys General
115 S. LaSalle St.
Chicago, Illinois 60603
(312) 858-0412

/s/ Russell Ainsworth
Attorney for Plaintiffs
Arthur Loevy
Jon Loevy

Michael Kanovitz
Russell Ainsworth
Theresa Kleinhaus
Lauren Carbajal
Loevy & Loevy
311 N. Aberdeen, 3rd Floor
Chicago, Illinois 60607
(312) 243-5900

CERTIFICATE OF SERVICE

The undersigned, an attorney, deposes and states that THE PARTIES' JOINT MOTION TO STRIKE DEFENDANTS' MOTION TO COMPEL CORRECTED EXPERT REPORT AS MOOT AND TO EXTEND EXPERT DISCOVERY was served upon counsel of record via electronic ECF filing this 4th day of November 2024.

s/Barbara L. Greenspan

Attorney